

U-Dial of Tennessee, Inc.  
345 Harrison St.  
Union City, TN 38261

June 12, 2003

**VIA HAND DELIVERY**

Sara Kyle  
Chairperson  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

**Re: Application of U-Dial of Tennessee, Inc. for a Certificate to  
Provide Competing Facilities-Based Services within the State  
Of Tennessee; Docket No. 03-00379**

Dear Ms. Kyle:

This letter is in response to the staff's request for additional information in regard to the CLEC application of U-Dial of Tennessee, Inc. (UDTN). UDTN proposes to offer prepaid, facilities-based local exchange service. Additional information relating to UDTN's intralata toll dialing parity plan is included in this submission.

An original and 13 copies are attached. Please refer all questions and correspondence regarding this filing to me. Thank you.

Sincerely,



Ellis Falkoff

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## **Intralata Toll Dialing Parity Plan**

### **INTRODUCTION**

UDTN currently does not offer competitive intrastate telecommunications services (i.e., intralata or interlata long-distance), nor does it plan to in the near future. UDTN provides resold basic local telecommunications services, including local calling ("dialtone") and access to 911 and 800 number services, on a prepaid basis only, to Tennessee customers. Thus, at present UDTN blocks its customers from accessing usage-based services. UDTN customers may access long-distance carriers through prepaid calling cards or other forms of toll-free access.

Should UDTN begin offering competitive intrastate telecommunications services, such as intralata and interlata long-distance service in Tennessee, UDTN will implement the following processes, which are designed to give end-user customers the opportunity to designate a carrier for their intralata toll call traffic in those market areas where UDTN will operate as a facilities-based local exchange service provider. Intralata toll calls will automatically be directed to the designated carrier without the customer having to dial an access code.

### **GEOGRAPHIC AVAILABILITY**

Intralata presubscription will be available in all LATAs where UDTN will provide its local resold and UNE-P based telecommunications services within the state of Tennessee. Intralata presubscription will be available in all exchanges of the underlying local exchange carrier where UDTN provides local resale and UNE-P based services.

### **IMPLEMENTATION SCHEDULE**

UDTN intends to offer toll dialing parity when the TRA approves UDTN's plan. Initially, UDTN will offer local exchange services as a reseller and UNE-P based provider, and will rely upon the underlying incumbent local exchange company to provide intralata toll dialing parity.

### **POLICIES**

UDTN will ensure that all customers are aware they have a choice of intralata and interlata toll carriers, and all carriers will be treated in a nondiscriminatory manner. In response to each request for UDTN's service, a UDTN rep will inform the customer that UDTN will presubscribe the customer's toll service to the intralata and interlata toll carrier(s) of the customer's choice. If requested by the customer, UDTN will provide a competitively neutral list of participating telecommunications carriers that provide intralata toll service in the customer's exchange. A new customer who does not select an intralata toll carrier will be

identified as NO PIC, and will not be automatically defaulted to a carrier. A NO PIC customer will be unable to make intralata toll calls on a 1+ or 0+ dialed basis, and will be required to dial the access code of a carrier (10-10XXX) to place intralata toll calls until the customer chooses an intralata toll carrier.

UDTN will deploy two-PIC (Primary Interexchange Carrier) technology in its switches, enabling customers to have either the same or two different carrier(s) for their intralata and interlata services.

Appropriate tariffs will be filed in accordance with this plan and with TRA's applicable rules and regulations.

UDTN will offer customers the ability to access all participating carriers by dialing the appropriate access codes (e.g., 10-10XXX).

All eligible UDTN end-user telephone line numbers will be presubscribed and have two PICs associated with them.

#### CARRIER INFORMATION

Interexchange carriers will have the option of offering intralata service only or intralata and interlata service.

Interexchange carriers will have the option of participating in all market areas or in a specific market area.

Interexchange carriers will be required to return a completed Non-Disclosure Agreement and Participation Agreement(s).

UDTN will not participate in billing disputes for intralata service between an alternative competing interexchange carrier and its customers.

UDTN representatives will not initiate or accept three-way calls from an alternative interexchange carrier in order to discuss presubscription.

Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner and UDTN.

#### CALL ELIGIBILITY/TOLL DIALING PLAN

All local service customers of UDTN will have calls routed according to the following plan:

If a UDTN Customer Dials:

911  
411/555-1212  
0-  
7 digits (local call)  
7 digits (Intralata toll call, same NPA)  
1 + 10 digits (Intralata toll call)  
0 + 10 digits (Intralata toll call)  
1 + 10 digits (Interlata toll call)  
0 + 10 digits (Interlata toll call)  
10-10-XXX+0  
10-10-XXX+7digits (Intralata toll)  
10-10-XXX+0+10 digits  
10-10-XXX+10 digits

The Call is Handled By/Routed To:

PSAP on originating line number  
Directory Assistance Operator  
Operator  
Local Exchange Carrier  
Intralata Toll Provider  
Intralata Toll Provider  
Intralata Toll Provider  
Interlata Toll Provider  
Interlata Toll Provider  
XXX Carrier  
XXX Carrier  
XXX Carrier  
XXX Carrier

If a UDTN customer originates a call to an alternative interexchange carrier's Operator by dialing 00-, the call will be routed to the PIC on that customer's line. If the customer originates a call to an alternative interexchange carrier's Operator by dialing an access code (e.g., 10-10-XXX + 0), the call will be routed to the XXX Carrier. In both cases, the carrier's switch is responsible for routing this call to the alternative interexchange carrier's Operator or to an announcement.

PRESUBSCRIPTION INFORMATION

Consistent with UDTN's tariffs, a PIC change charge may be incurred and billed to a UDTN customer for each eligible line where a PIC change is made. Currently, UDTN does not have a PIC change charge waiver period.

New line customers, including customers adding lines, will have the opportunity to select a participating carrier, or they will be assigned a NO PIC designation. If a customer cannot decide upon an intralata carrier at the time of order, UDTN may extend the 30-day period following placement of the customer's service order for the customer to select an intralata carrier without charge. Such customer will be assigned a NO PIC designation in the interim. After this 30-day period, UDTN will assess the PIC change charge as described above. Customers assigned a NO PIC designation, as set forth in this paragraph, will be required to dial an access code to reach an intralata carrier's network.

If a UDTN customer denies requesting a change in intralata toll providers as submitted by an intralata carrier, and the intralata carrier is unable to produce a Letter of Agency signed by the customer or some other form of verification that is permitted by law, the PIC will be changed as per the customer's request and the intralata carrier will be assessed a charge for the unauthorized PIC change. This penalty is in addition to any other penalties authorized by law, which UDTN may pursue.

Alternative interexchange carriers may submit PIC changes to UDTN via a fax/paper interface.

UDTN will process intralata PIC selections in the same manner and under the same intervals of time as interlata PIC changes.

Carriers will be required to submit PIC changes via paper. UDTN will provide carriers with PIC order confirmation and rejection information. Specific details regarding this process will be provided to participating carriers.

Some customers may change their local service provider from the incumbent LEC to UDTN and retain their incumbent LEC telephone number(s). As part of this process, for such customers UDTN will provide the selected intralata carrier with both the retained (incumbent LEC) telephone number and the UDTN telephone number.

#### ANTI-SLAMMING

To ensure that its customers have affirmatively selected an intralata or interlata toll carrier, UDTN will not switch a new customer's long distance carrier until it has received a Letter of Authorization from the new customer in accordance with Section 64.1100 of the Rules of Federal Communications Commission, 47 C.F.R. §64.1100, and applicable Tennessee regulations.

#### COMPLIANCE WITH APPLICABLE LAWS

UDTN will comply with all applicable federal communications laws, state laws, and TRA regulations.